

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

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Mr. Thomas Peterson, Vice-President
Levin Richmond Terminal Corporation
402 Wright Avenue
Richmond, CA 94804

Dear Mr. Peterson:

This is a follow-up of our meeting on April 7, 1986 during which we discussed the draft report dated February 26, 1986 entitled "Site Characterization and Remedial Action Plan Former United Heckathorn Site, Richmond, California" (Plan), prepared by your consultants, Harding Lawson Associates.

At that meeting we informed you that our principal concern with the draft Plan was the all or nothing approach used to identify alternative remedial actions. At a subsequent meeting with your consultants on April 21, 1986 we indicated that we disagree with their interpretations of biological data collected to date regarding the demonstration of beneficial use impacts. A further study is being planned by the regulatory agencies and we expect the company to contribute to its funding.

The outcome of this approach by your consultants was a recommended list of alternatives for site clean-up that is less in scope than we feel is appropriate for a site as polluted as the former United Heckathorn Site.

The Regional Board and Regional Board staff are sensitive to and appreciate the need to strike an appropriate balance between the need to mitigate conditions at polluted sites and the financial costs associated with site clean-up. We strongly recommend that the range of alternatives and the blending of various levels of efforts be reexamined by your consultant.

For example, a range of options for sediments in Lauritzen Canal might include no action until the USCE designates a new ocean disposal site, with provisions for interim capping or other isolation concepts and a time schedule for dredging and transport to an upland site should the USCE not designate an ocean disposal site. Dredging selected hot-spot areas with upland disposal with

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further dredging and ocean disposal at a later date, should also be evaluated. A similar consideration of various levels of effort should be evaluated for the embankment soils and upland soil areas.

Other related issues that should be addressed in the final Plan concern the contention made in the draft Plan that implementation of a clean-up plan will disrupt business. Specifically, the final Plan should describe measures that can be taken to stage clean-up so as to minimize interferences with normal business operations such as provisions for temporary electric supplies.

Also, some analysis should be provided regarding the economic benefit to Levin Richmond Terminals resulting from dredging the entire length of Lauritser Canal, as well as other improvements (i.e. asphaltting site, relocation of railroad tracks, etc.)

Finally, as regards groundwater monitoring, a frequency of at least quarterly will be required.

If you have any questions regarding this matter, please contact Ms. Robin Breuer at (415) 464-4223, or me at (415) 464-0503.

Sincerely,



Donald D. Dalke, Chief
Toxic Clean-up Division

cc: Mr. Fred Cox, PRTC
Mr. John Parr Cox, PRTC
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Mr. Mike Rugg, CDOFAG
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